

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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THE MANAGEMENT GROUP, LLC, ANDREW	:	
FOX, and LEE HEIMAN,	:	
	:	
Plaintiffs,	:	
	:	
- against -	:	08-02172(PKC)
	:	
ANGEL MUSIC GROUP LTD., NEIL MOFFITT,	:	
NICK McCABE, JESSIE ANGLES, ANU DHAMI,	:	
ISABEL PIAGGI, and DAN A. VIDAL,	:	
	:	
	:	
Defendants.	:	
-----	x	

**AFFIDAVIT OF JESSIE ANGLES**  
**IN SUPPORT OF MOTION TO DISMISS**

STATE OF NEVADA            )  
                                      :       SS.:  
COUNTY OF                 )

JESSIE ANGLES, being duly sworn, says:

1. I am a citizen of the United States and the State of Nevada. I reside at 533 Truffles St, Henderson, NV 89015. I was served with the complaint in this action, a copy of which is annexed as Exhibit 1, on March 14, 2008.

2. The complaint against me should be dismissed for lack of personal jurisdiction. I do not live in New York. I do not own property in New York. I do not work in New York. I never contracted to deliver any good or service in New York. I did no tortious act that had an effect in New York. I transact no business in New York.

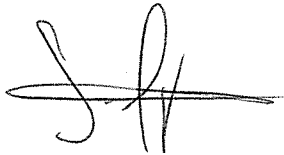
3. The complaint against me alleges a number of common-law causes of action arising out of my departure from the employment of Plaintiff The Management Group, LLC ("TMG") and my joining Defendant Angel Music Group, Ltd. ("Angel").

4. Both TMG and Angel manage musical artists on a worldwide basis. I worked for TMG from May 17<sup>th</sup> 2006 until July 15<sup>th</sup> 2007 as an Art Director. I had no employment contract with TMG during my employment there. At all times during my employment with TMG I was located in the State of Florida. I delivered services to TMG from the office in Florida to its worldwide client base. I did not travel to New York for business and did not otherwise avail myself of this jurisdiction for any purpose.

5. I communicated with employees of TMG in New York and elsewhere as part of my duties, but as shown in the accompanying memorandum of law, this is insufficient to support jurisdiction in New York.

WHEREFORE, the motion to dismiss the complaint as against me should be granted.

April 7, 2008



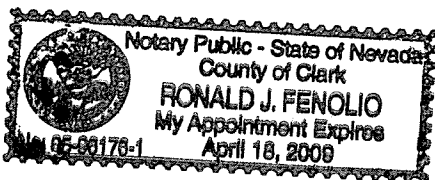
Jessie Angles

STATE OF NEVADA  
COUNTY OF CLARK

THIS INSTRUMENT WAS ACKNOWLEDGED BEFORE ME

ON 4-7-08 BY Jessie Angles

Ronald J. Fenolio  
NOTARY



KARAAHMETOGLU & LUZ FIRM LLP

By: /S/

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